

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

3M COMPANY,

Court File No.: 0:20-cv-01314 (SRN/DTS)

Plaintiff,

v.

MATTHEW STARSIAK,
AMK ENERGY SERVICES LLC, and
JOHN DOES 1 THROUGH 10, whose
true names are largely unknown,

**DECLARATION OF
ROBERT W. VACCARO IN SUPPORT
OF DEFENDANTS' OPPOSITION TO
MOTION FOR PRELIMINARY
INJUNCTION**

Defendants.

Pursuant to 28 U.S.C. § 1746, I, Robert W. Vaccaro, hereby declare as follows:

1. I am one of the attorneys representing Defendants Matthew Starsiak and AMK Energy Services LLC in the above-captioned matter.
2. Attached hereto as Exhibit A are true and correct copies of relevant excerpts from the transcript of the July 27, 2020 deposition of Matthew Starsiak.
3. Attached hereto as Exhibit B are true and correct copies of relevant excerpts from the transcript of the July 29, 2020 deposition of Eric Schuster.
4. Attached hereto as Exhibit C are true and correct copies of a June 7, 2009 Navy and Marine Corps Commendation Medal, a May 31, 2012 Defense Meritorious Service Medal, and a April 24, 2015 Meritorious Service Medal received by Matthew Starsiak.
5. Attached hereto as Exhibit D are true and correct copies of recommendation letters that Matthew Starsiak has received from Neil Orton, Brian J. Esposito, Nathan

Munsinger, Thomas McGrath, Larry Adams, Charles Pickett, Manish Kukreti, Fernando Dalmau, Mitchel Garsz Garcia, Ajay Yalamanchi, and Don Salazar.

6. Attached hereto as Exhibit E are true and correct copies of relevant excerpts from the transcript of the July 31, 2020 deposition of Haley Schaffer.

I declare under penalty of perjury that the foregoing is true and correct.

This 26th day of August, 2020.

s/Robert W. Vaccaro

Robert W. Vaccaro